

Preliminary hearing
3/9/12

WDS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 12- 192

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UNITED STATES OF AMERICA

- against -

C O M P L A I N T

(T. 18 U.S.C. § 1546)

MUTIAT TAIWO DOSUNMU,

Defendant.
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EASTERN DISTRICT OF NEW YORK, SS:

JANELLE RUDIE, being duly sworn, deposes and states that she is a Special Agent with the Department of State, Diplomatic Security Service ("DSS"), duly appointed according to law and acting as such.

Upon information and belief, on or about February 25, 2012, within the Eastern District of New York, the defendant MUTIAT TAIWO DOSUNMU, did knowingly and willfully use and attempt to use a United States visa that was procured by means of a false claim or statement and otherwise procured by fraud and unlawfully obtained.

(Title 18, United States Code, Section 1546)

The source of your deponent's information and the grounds for this belief are as follows:¹

¹ Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause, I have not set forth all the facts and circumstances of which I am aware.

1. My information comes from a joint investigation of the DSS and the United States Customs and Border Protection agency ("CBP"). I have spoken with CBP Officers and reviewed documents.

2. On February 24, 2012, at approximately 10:00 p.m., the defendant MUTIAT TAIWO DOSUNMU, arrived at John F. Kennedy International Airport ("JFK") on Arik Airlines, Flight No. HFY-107, originating from Lagos, Nigeria. Upon arrival, the defendant presented Nigerian passport #A02090799, in the name "Taiwo Mutiat Emmanuel," date of birth September 25, 1985, to a CBP officer. The passport contained a B1/B2 visa, Visa Foil No. C4782515 (Control No. 20102515750001), issued by the United States Department of State Bureau of Consular Affairs in Abuja, Nigeria on September 8, 2010.

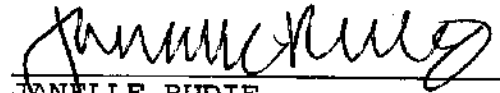
3. The defendant MUTIAT TAIWO DOSUNMU was selected for a secondary inspection by CBP officers, after CBP Officers noticed that the defendant had applied for her visa along with a person she claimed to be her husband, KOLADE TAYO EMMANUEL. Notably, the documents supporting EMMANUEL's visa application stated that he was Managing Director of a company called "Jibmatt Resources Limited." CBP Officers, however, had previously arrested another individual, whose documents contained the same information; that individual had admitted the information was fraudulent and that he had paid a document vendor in Nigeria to procure false documents in order to obtain a visa.

4. During the defendant's secondary inspection, the defendant presented additional identification documents in the name "Mutiat Taiwo Dosunmu," which the defendant stated was her maiden name. Identification documents in the defendant's possession, however, including a Nigerian National Identification Card, showed a different date of birth of September 25, 1980 (five years prior to the date of birth on her visa). Further database checks using the name MUTIAT TAIWO DOSUNMU and the date of birth of September 25, 1980 revealed that the defendant had previously applied for and been denied a visa, although she did not disclose that prior refusal as required on the instant visa application. I have compared the photographs relating to both the prior application that was denied and the defendant's application for the visa she presented at J.F.K., and they appear to be the same person.

5. Upon questioning, in sum and in part, the defendant MUTIAT TAIWO DOSUNMU admitted that her true date of birth was September 25, 1980, and that she and KOLADE TAYO EMMANUEL were married "just on paper" for the purpose of obtaining a United States visa. The defendant described EMMANUEL as "a friend," but stated that they had never lived together as man and wife. Rather, the defendant stated that she and EMMANUEL had paid an individual in Nigeria to procure false documents in order to obtain visas. The defendant stated that she had been shown the false information prior to her interview with U.S. consular

officials in Abuja, Nigeria, so that she would know what to say during the interview.

WHEREFORE, your deponent respectfully requests that the defendant MUTIAT TAIWO DOSUNMU be dealt with according to law.



JANELLE RUDIE
Special Agent
U.S. Department of State

Sworn to before me this
25th day of February, 2012

The Honorable Lois Bloom
United States Magistrate Judge
Eastern District of New York